

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

In re:

BLOCKFI INC.¹, et al.,
Debtors.

BLOCKFI INC. AS THE WIND DOWN
DEBTORS,

Plaintiff,

v.

ACE AMERICAN INSURANCE COMPANY,
ARCH INSURANCE COMPANY, AXIS
INSURANCE COMPANY, BERKLEY
INSURANCE COMPANY, BERKSHIRE
HATHAWAY SPECIALTY INSURANCE
COMPANY, ENDURANCE AMERICAN
SPECIALTY INSURANCE COMPANY,
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, U.S.
SPECIALTY INSURANCE COMPANY, XL
SPECIALTY INSURANCE COMPANY,

Defendants.

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered under a Confirmed
Plan)

Adv. Proc. No. 24-01067 (MBK)

**DECLARATION OF SETH D. GRIEP, ESQ. IN
SUPPORT OF APPLICATION TO ADMIT PRO HAC VICE**

¹ The Wind-Down Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965); and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

I, **SETH D. GRIEP, ESQ.**, of full age, hereby declare under penalty of perjury as follows:

1. I am an attorney at law of the State of New Jersey and a Partner at the law firm of Kaufman Dolowich, LLP, counsel for defendant, Endurance American Specialty Insurance Company (“Endurance”) in the above-captioned matter.

2. I submit this Declaration in support of Endurance’s Application to Admit Counsel *Pro Hac Vice*, seeking Kevin J. Windels, Esq.’s admission to practice as such before this Court, pursuant to Local Civil Rule 101.1(c), D.N.J. LBR 9010-1 and D.N.J. LBR 2090-1, to represent Endurance in the above-captioned matter.

3. I am duly licensed and admitted to practice law in the State of New Jersey and in the United States District Court, District of New Jersey, having been admitted to both in 2003 and 2006, respectively. I am also admitted to practice law in the States of New York (2016), Colorado (2021), Alaska (2024), and in the District of Columbia (2016).

4. I am a member in good standing in the bars of each of these jurisdictions, and there are no disciplinary proceedings pending against me in any jurisdiction. I have never been disciplined by any bar in any jurisdiction.

5. Endurance seeks the admission of Kevn J. Windels, Esq. pursuant to Local Civil Rule 101.1(c), D.N.J. LBR 9010-1 and D.N.J. LBR 2090-1 for the purposes of Mr. Windels' appearance and participation as its attorney in this action.

6. Mr. Windels is a Partner with the law firm of Kaufman Dolowich, LLP and his office is located at 40 Exchange Place, 20th Floor, New York, New York 10005. Mr. Windels is an experienced attorney, known to me as an attorney authorized to practice in the State of New York (among other jurisdictions), who has an ongoing client relationship with Endurance and is familiar with the facts of this case. Endurance respectfully requests that Mr. Windels be permitted to appear *pro hac vice* on its behalf in this matter.

7. I believe Mr. Windels to be of good character and know of no reason why this Court should not permit him to appear *pro hac vice* in this matter. Kaufman Dolowich, LLP, through its principals, counsel and associates, will vouch for the good conduct, character and integrity of Mr. Windels, agree to be fully responsible for his conduct relating to the litigation of this matter, will attend all proceedings in the case with him, and will assure compliance with all federal and state admission requirements.

8. Mr. Windels understands, as I do, that if he is admitted, it will remain my responsibility in accordance with Local Civil Rule 101.1(c) and D.N.J. LBR 9010-1(b) to review, sign and file all papers, enter appearances for parties, to accept

service of all papers, to sign stipulations, to oversee the conduct of the case, to be present in Court as required by the Court and to sign and receive payments on judgments, decrees or orders. We will also abide by the provisions of New Jersey Court Rules 1:21-2 and 1:28-2(a).

9. Pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary in support of this application because all facts in support of this application because all facts in support of this application are set forth in the accompanying Declaration of Kevin J. Windels, Esq., and there are no legal issues that must be briefed in connection with this application.

10. As required by New Jersey Court Rule 1:28-2(a), payment will be forwarded to the New Jersey Lawyers' Fund For Client Protection on behalf of Mr. Windels upon his admission *pro hac vice*.

11. In view of the foregoing, I respectfully request that Kevin J. Windels be admitted *pro hac vice*.

I hereby declare that the foregoing statements made by me are true. I am aware that if the foregoing statements made by me are willfully false, that I am subject to punishment. 28 U.S.C. § 1746.

Dated: March 7, 2024

Respectfully submitted,

By: /s/ Seth D. Griep

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